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1           **UNITED STATES DISTRICT COURT**  
 2           **NORTHERN DISTRICT OF CALIFORNIA**

3           ANIBAL RODRIGUEZ, SAL  
 4           CATALDO, JULIAN  
 5           SANTIAGO, and SUSAN LYNN  
 6           HARVEY, individually and on behalf of all  
 7           others similarly situated,

8           Plaintiffs,  
 9           vs.  
 10          GOOGLE LLC,  
 11          Defendant.

12          Case No.: 3:20-cv-04688-RS

13          **ADMINISTRATIVE MOTION TO**  
 14          **CONSIDER WHETHER ANOTHER**  
 15          **PARTY'S MATERIAL SHOULD BE**  
 16          **SEALED**

17          The Honorable Richard Seeborg  
 18          Courtroom 3 – 17th Floor  
 19          Date: May 15, 2025  
 20          Time: 1:30 p.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts Donna Hoffman, John Black, and Christopher Knittel. As noted in the below chart, the Court has already addressed sealing with respect to some (but not all) of these documents.

Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Expert Report of Donna Hoffman, served by Google on May 31, 2023  <u>Portions:</u> Pg 91, Footnote 280  Attached as Exhibit 1 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 10), which addressed the same document.
Supplemental Expert Report of Donna Hoffman, served by Google on March 24, 2025  Entirety  Attached as Exhibit 2 to the Frawley Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order
Expert Report of John Black, served by Google on May 31, 2023  <u>Portions:</u> Paragraphs 41, 43, 43, 60, 74, 80, 83, 90, 92, 99, 101, 107, 123, 128, 132, 143-47, 151, 155, 167, 169, 174, 178, 192, 201, 214  Attached as Exhibit 3 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 12), which addressed the same document.
Expert Report of Christopher Knittel, served by Google on May 31, 2023  <u>Portions:</u> Pg 30, Footnote 116; Page 50, Footnote 176; Page 83, Footnote 285  Attached as Exhibit 4 to the Frawley Declaration	Google	The Court's January 3, 2024 sealing order (Dkt. 353 at 12), which addressed the same document.
Transcript from the Deposition of Donna Hoffman, taken by Plaintiffs on July 11, 2023	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

1	Entirety		
2	Attached as Exhibit 5 to the Frawley Declaration		
3	Transcript from the Deposition of Christopher Knittel, taken by Plaintiffs on July 11, 2023	Google	Designated “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
4			
5	Entirety		
6	Attached as Exhibit 6 to the Frawley Declaration		
7			
8	Supplemental Expert Report of Bruce Schneier, served by Plaintiffs on January 6, 2025	Google	Refers to Material Designated “Confidential” and “Highly Confidential – Attorneys’ Eyes Only” by Google pursuant to the Protective Order
9			
10	Entirety		
11	Attached as Exhibit 7 to the Frawley Declaration		
12			

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 3, 2025

Respectfully submitted,

By: /s/ Mark Mao

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